



Letitia James
Attorney General

**Office of the New York State
Attorney General**

January 15, 2025

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
Via ECF

Application GRANTED in part. A Case Management Plan substantially adopting Defendant's proposal will issue separately. The Court generally does not extend fact discovery longer than 120 days. The Clerk of Court is respectfully directed to close the motion at Dkt. No. 62.

Dated: January 16, 2025
New York, New York

RE: *Mendez v. John Jay College of Criminal*
1:23-CV-08816 (LGS)

A handwritten signature in black ink, appearing to read "L. G. Schofield".

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

This office represents Defendant, The City University of New York (s/h/a "John Jay College of Criminal Justice") in this action. Per Your Honor's December 18, 2024 Order (ECF No. 53), I write to provide a proposed Civil Case Management Plan and Scheduling Order (Ex. A) and to advise the Court that Defendant is not interested in pursuing alternative dispute resolution at this time (Plaintiff has suggested that he is).

After exchanging several drafts of Your Honor's Scheduling Order Form, Plaintiff and Defendant were unable to agree on a schedule.¹ Defendant first sent a proposed schedule to Plaintiff on January 8, 2025. Plaintiff agreed to the proposed dates, and made some other edits to the scheduling order. Defendant provided a revised draft incorporating those changes, and asked Plaintiff to sign the proposed scheduling order. However, on January 14, 2025, Plaintiff returned the proposed order with revised dates (Ex. B). Plaintiff also indicated that he was submitting a letter to the Court seeking different deadlines (which did not match either the initially agreed upon deadlines or the deadlines that Plaintiff proposed in the revised draft scheduling order).

While Defendant does not object to some of Plaintiff's revisions to the proposed schedule (such as where Plaintiff proposes deadlines up to two weeks after Defendant's proposal), Defendant does not agree to certain extended deadlines proposed by Plaintiff, including any extension of the completion of discovery beyond May 2025. Thus, in the interest of compromise, Defendant is attaching a proposed Scheduling Order adopting some of Plaintiff's suggested deadlines.

¹ By letter dated January 8, 2025, Plaintiff requested that all communications from my office be sent by email.

The Hon. Lorna G. Schofield
January 15, 2025

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Because discovery should be limited in this case, Defendant respectfully requests that the Court adopt the proposed Scheduling Order attached as Exhibit A.

Respectfully submitted,

/s/ Samuel A. Martin
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CC:

Plaintiff *pro se* (Via Mail and Email)